

STATEMENT OF BASIS (AI No. 6858)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0051969 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Griffin Industries, Inc.
P.O. Box 237
Holden, LA 70744

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: November 29, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: March 1, 2002
LPDES permit expiration date: February 28, 2007
EPA has not retained enforcement authority.

C. Date Application Received: August 30, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - cooking oil recycling facility

Griffin Industries is a cooking oil recycler producing yellow grease. By heating and separating spent cooking oil. The water and impurities from the spent oil are filtered and the finished product (yellow grease) is shipped to customers as an inedible oil product. Activity at this facility also consists of collecting fat and bone trimmings from local businesses using route trucks, and then transferring this material onto a tractor trailer for transport to the central plant in Jackson, Mississippi.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I (BPJ; operations are not typical for SIC code 2077)
3. Wastewater Type: II
4. SIC code: 2077

C. LOCATION - 25324 Griffin Industries Road in Holden, Livingston Parish
Latitude 30°31'32", Longitude 90°39'36"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: process wastewater, washdown wastewater, boiler blowdown, and stormwater runoff

Treatment: mechanical skimmer, dissolved air flotation unit, grease trap, anaerobic pond, two aerobic ponds and one settling pond

Location: at the point of discharge from the settling pond
(Latitude 30°31'32", Longitude 90°39'36")

Flow: 0.017 mgd

Discharge Route: unnamed ditch, thence into the Tickfaw River

4. RECEIVING WATERS

STREAM - unnamed ditch, thence into the Tickfaw River

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040501

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
g. outstanding natural resource waters*

*Outstanding Natural Resource Water is also listed as a designated use of Segment 040501(Tickfaw River). However, this designated use is applicable only if the discharge is directly into the waterbody and not into a tributary or distributary of the waterbody, per LAC33:IX.1111.G.

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit: None

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

B. DMR Review/Excursions - DMRs were reviewed from April to September 2006. The excursions are as follows:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
4/05	TSS	001	253	135
5/05	BOD	001	63	45
9/05	BOD	001	88 (Rita)	45
2/06	BOD	001	55	45

7. EXISTING EFFLUENT LIMITS

Outfall 001 -
BOD --:45 mg/l
TSS --:135 mg/l
Oil and Grease --:15 mg/l
Fecal Coliform --:400 colonies/100ml
pH 6-9

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040501 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon, which is listed as a threatened species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

12. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

In accordance with LAC 33:IX.2707.I.3 and LAC 33:IX.2707.I.4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. The Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit, along with other requirements. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2511.B.14 [40 CFR 122.26(b)(14)].

Rationale for Griffin Industries, Inc.

1. **Outfall 001** process wastewater, washdown wastewater, boiler blowdown, and stormwater runoff (estimated flow is 0.017 MGD)

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg: Daily Max (mg/l)	
Flow	Report: Report	LAC 33:IX.2707.I.1.b.
BOD5	---:45	see justification below
TSS	---:135	see justification below
Oil & Grease	---:15	see justification below
Fecal Coliform	---:400	see justification below
pH	6.0:9.0 s.u. (min): (max)	see justification below

Treatment: mechanical skimmer, dissolved air flotation unit, grease trap, anaerobic pond, two aerobic ponds and one settling pond

Monitoring Frequency: 1/month

Limits Justification: Limits based upon LDEQ's guidance on Class II Sanitary Wastewater, and the previous LPDES permit. Fecal coliform limit is included because of the possibility of fecal contamination from the collection of animal fat and bone trimmings.

This facility does not fit the definition of a render; therefore, 40 CFR 432.103 does not apply.

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL Waterbodies

Subsegment 040501, Tickfaw River-From Mississippi State Line to La. Hwy 42, is listed on LDEQ's Final 2004 303(d) List as impaired for mercury, pathogen indicators, and TDS. To date no TMDL's have been completed for this subsegment. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the cooking oil recycling facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally,

Statement of Basis for
Griffin Industries, Inc.
LA0051969, AI No. 6858
Page 6

suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Therefore, for the purposes of this permit, TDS will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

TDS

A TSS limit has been placed in the permit.